



UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND)	
COMPOUNDING PHARMACY, INC.)	MDL No. 1:13-md-02419
PRODUCTS LIABILITY LITIGATION)	
)	Hon. F. Dennis Saylor, IV
This Document Relates To: All Cases)	
)	

Exhibit B to Subpoena

DEFINITIONS

1. Liberty Industries shall be known as "Liberty".
2. New England Compounding Pharmacy, Inc. shall be known as "NECP".
3. Ameridose, LLC shall be known as "Ameridose".
4. "NECP cleanroom" shall mean any cleanroom, ante room, or prep room designed, constructed, installed, built, maintained, serviced and/or repaired by Liberty on NECP's premises in Framingham, Massachusetts.
5. The term "related to" shall be construed in its broadest sense.
6. The term "identify" shall be construed in its broadest sense.
7. The term "including" and "includes" shall be construed to mean "without limitation."
8. The term "documents" shall mean any and all writings, drawings, graphs, charts, photographs, sound records, images, electronically stored information, data or data compilations stored in any medium form.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All contracts and/or agreements between and among Liberty, Ameridose, and/or NECP for the design, construction, installation, maintenance, and/or repair of any NECP cleanroom.

2. All documents related to services rendered regarding the design of any NECP cleanroom, including memorandums, notes, correspondence, requests for proposals, proposals, quotes, bids, estimates, draft blueprints, and as-built blueprints.

3. All documents related to services rendered for the construction of any NECP cleanroom, including memorandums, notes, correspondence, requests for proposals, proposals, quotes, bids, estimates, draft blueprints, and as-built blueprints.

4. All documents related to services rendered for installation of any NECP cleanroom, including memorandums, notes, correspondence, requests for proposals, proposals, quotes, bids, estimates, draft blueprints, and as-built blueprints.

5. All documents related to services rendered for maintenance of any NECP cleanroom, including memorandums, notes, correspondence, requests for proposals, proposals, quotes, bids, estimates, draft blueprints, and as-built blueprints.

6. All documents related to services rendered for any repairs of any NECP cleanroom, including memorandums, notes, correspondence, requests for proposals, proposals, quotes, bids, estimates, draft blueprints, and as-built blueprints.

7. All schematics, diagrams, blueprints and any other renderings of any NECP cleanroom.

8. All documents related to any service rendered to NECP or Ameridose by Liberty, including purchase orders, invoices, maintenance logs, and building permits.

9. All documents, including regulations, specifications, and/or building codes, related to the design, construction, installation, maintenance, and/or repair of any NECP cleanroom.

10. All documents related to any preliminary work performed prior to the design, construction, installation, maintenance, and/or repair of any NECP cleanroom, including test results, blueprints, site analysis, and investigations.

11. Written standards, instructions, and specifications related to the processes, methods, policies, and/or protocols used by Liberty to design, construct, install, maintain, and/or repair any NECP cleanroom.

12. All documents, checklists, and/or other records reflecting the specific criteria used to determine whether a cleanroom is "clean."

13. All documents related to inspections, citations, violations, and/or notices of lack of compliance from Federal, State and/or Local agencies related to any cleanroom designed, constructed, installed, maintained, and/or repaired by Liberty.

14. All documents related to inspections, citations, violations, and/or notices of lack of compliance from Federal, State and/or Local agencies related to any NECP cleanroom.

15. All documents related to complaints from Liberty customers regarding any cleanroom it designed, constructed, installed, maintained, and/or repaired.

16. All documents constituting and/or related to Liberty's current and/or former procedures or policies for tracking and/or documenting maintenance and repair(s) made to any NECP cleanroom.

17. Email communications, letters, documents and/or other correspondence between and among Liberty, NECP, Ameridose, and/or any independent contractors and/or subcontractors, related to any NECP cleanroom.

18. Email communications, letters, documents and/or other correspondence between any representative, employee, agent, independent contractor, or subcontractor of Liberty and any representative, employee, or agent of any third party, including any governmental or other regulatory agency related to any NECP cleanroom.

19. All documents related to any training, warnings, and/or instructions provided to NECP.

20. All documents related to any warranties, extended warranties, and/or service agreements related to any NECP cleanroom.

21. All documents, including correspondence, related to the design, construction, installation, maintenance, and/or repair(s) of any NECP cleanroom.

22. All documents, including correspondence, related to the products and equipment considered for the design, construction, installation, maintenance and/or repair of any NECP cleanroom, including documents related to the basis for using each product or piece of equipment.

23. Recordings, transcripts and/or notes of telephone calls or meetings with any representatives, employee, agent, independent contractor, and/or subcontractor of NECP.

24. All documents related to the design, construction, use, and/or maintenance of any NECP cleanroom, including documents related to: a) materials used in construction; b) permissible particle concentrations and other specifications; c) instrumentation and monitors; d) ventilation, pressurization, temperature and/or humidity; e) any other contamination control considerations; and f) standards, regulations, calibrations and specifications.

25. All documents related to the instruments, monitors, machines, and other devices related to maintaining the sterility of any NECP cleanroom, including warranties, instructions, service requirements, and maintenance information.

26. All documents that set forth any United States Pharmacopeia <797> standards relied upon or referred to with respect to the design, construction, installation, maintenance, and/or repair of any NECP cleanroom.

27. All photographs taken at any time of any NECP cleanroom.

28. All videotape taken at any time of any NECP cleanroom.

29. A copy of the "*Cleanroom Primer*" with revisions, as published from 2006 to 2012.

30. A copy of the "The Cleanroom Maintenance Primer" with revisions, as published from 2006 to 2012.

31. A copy of the "*Your Guide to a Cleanroom Facility*" with revisions, as published from 2006 to 2012.

32. Materials list for all materials used in the construction and/or installation of any NECP cleanroom.

33. All documents related to any HVAC design, engineering, installation and/or consultation for any NECP cleanroom.

34. Insurance policies issued to Liberty providing coverage for any claims made by any party, including NECP and Ameridose, from 2006 to 2012.

35. All certifications issued by Liberty to NECP or Ameridose related to any NECP cleanroom.

RESPECTFULLY SUBMITTED

/s/ Marc E. Lipton

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